

# **EXHIBIT A**

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**From:** Ben Hodges  
**Sent:** Friday, January 26, 2018 8:44 AM  
**To:** 'Cameron H. Tousi'  
**Cc:** 'Al Van Kampen'; Cristofer Leffler; Kevin Ormiston; Ryan Duffey; 'Andrew C. Aitken'  
**Subject:** RE: SOLOWHEEL V. NINEBOT - FIRST AMENDED COMPLAINT.DOCX

Cameron,

Thanks for getting back to me. I appreciate your views, though I of course disagree with them. That said, I realize this isn't an issue that we will change each other's minds on, so we will simply proceed with filing it as a standard opposed motion.

Thanks.

Ben

**Ben Hodges**

**ATTORNEY**

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**From:** Cameron H. Tousi [<mailto:chtousi@ipllfirm.com>]

**Sent:** Thursday, January 25, 2018 9:18 PM

**To:** Ben Hodges

**Cc:** Al Van Kampen; Cristofer Leffler; Kevin Ormiston; Ryan Duffey; Andrew C. Aitken

**Subject:** Re: SOLOWHEEL V. NINEBOT - FIRST AMENDED COMPLAINT.DOCX

Ben,

We have now heard back from our client about the matter, and we will oppose your proposed motion to amend the complaint. There are many reasons for this, including that the case was originally filed Aug. 4, 2016 and is well under way, that the schedule has been set and re-set by the Court, that Solowheel, or the predecessor owner of the patents, Inventist, could have added the patents far earlier so as not to prejudice the Court and Defendant Ninebot with its calendaring and trial schedule. We are available to discuss the matter at your convenience.

Best regards,  
Cameron

On Tue, Jan 16, 2018 at 4:48 PM, Ben Hodges <[ben.hodges@foster.com](mailto:ben.hodges@foster.com)> wrote:

Cameron and Al,

Solowheel intends to move to amend its Complaint to add 2 design patents. I've attached a draft of the Amended Complaint for your review. Please let us know if will stipulate to this amendment or if we need to file a Motion.

Thank you.

Ben

**Ben Hodges**  
**ATTORNEY**

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